

From: "vof@nofavt.org%inter2" <vof@nofavt.org>
Subject: Farm Bill 2007 Official Comments - 12/27/2005 01:03 PM CST
Date Sent: 12/27/2005 01:03:49 CST
Date Received: 12/27/2005 01:06:07 CST

Email: vof@nofavt.org
FirstName: John
LastName: Cleary
Address1: PO Box 697
Address2:
City: Richmond
State: Vermont
zipcode: 05401

Question1: 1) The Organic certification cost share program (Sec. 10606 from 2002 farm bill) should receive a mandatory \$2 M per year. Standardized reporting should be required for both allocations to states and actual disbursement to producers and handlers.

2) USDA should support policies and programs that encourage growth of small and medium-sized farms. Such programs include the Sustainable Agriculture Research and Education (SARE) and Value-Added Program Grants (VAPG). Funding for these programs should be expanded.

3) Implement the many beginning farmer and rancher provisions of the 2002 Farm Bill, the authorization for special conservation incentives for beginning farmers and ranchers, and seek funding for the Beginning Farmer and Rancher Development Program. Beginning farmer and rancher programs should be expanded to specifically serve beginning organic farmers and ranchers.

4) Other financial incentives including tax breaks for transitioning to organic should be offered

5) Require labeling and strict liability for GMO contamination from GMO patent-holders and/or manufacturers

Question2: Emerging markets such as the organic industry should be more strongly supported. Organic agriculture has seen nearly 20% annual growth over the last decade. Various estimates place organic retail sales as being between 1.5%-2.5% of total U.S. food sales. Organic certification brings an added value to any crop, making it a desirable alternative for many producers. Yet, organic producers still receive a disproportionately small share of USDA resources. Specific recommendations detailed below.

1) Increased support should be given to conservation ?green? payments such as the Conservation Security Program. Conservation practices, such as those used by organic farmers, should be rewarded.

2) The USDA AMS National Organic Program should comply with international standards for certification and accreditation, as defined by the International Organization for Standardization (ISO). Specifically, the USDA should comply with ISO/IEC 17011 (regarding general requirements for accreditation bodies accrediting conformity assessment bodies) and ISO Guide 65 (which specifies general requirements that a third-party operating a product or service

certification system shall meet if it is to be recognized as competent and reliable). Adherence to these Programs ensures that accreditation and certification agencies operate in a consistent and reliable manner. For example, domestic and international certifiers are treated differently by USDA NOP accreditation .

3) Support increase in research dollars for public varieties of plants to meet the needs of organic

Question3: Despite gains in the 2002 Farm Bill, Organic producers continue to receive a disproportionately small share of USDA resources. Organic agriculture currently makes up about 2% of US retail food sales but receives only a fraction of a percent of USDA research, marketing and conservation programs.

1) Effective and reasonable payment limitations to the Environmental Quality Incentives Program must be restored in the 2007 Farm Bill. EQIP funds should be used for offering incentive payments for growers to transition to organic production and other environmental practices. Safeguards are also needed against using EQIP to expand concentrated livestock production.

2) CSP should be restructured to work better for organic producers. Basic organic practices such as cover cropping and crop rotations should be prioritized, and organic farm plans should be accepted as proof of compliance with the highest tier (III) of conservation.

3) Organic Research and Extension: organic producers find few information resources available to them to address production or marketing issues specific to organic. Federal agricultural research dollars dedicated to organic food and farming are disproportionately low in relation to the size of the organic industry. Only since 1998 has organic research been funded at all, and it currently receives far less than a proportionate share of federal agriculture research dollars. In 2004, 3.1% of the USDA gross outlays (\$2.5 B) was used to fund and research and education. Of this \$2.5 B, only about \$10 M (0.4%) went to organic specific research.

a. An organic program should be developed within the USDA ARS with the oversight of a National Program Leader (NPL) for Organic Agriculture. A framework of "fair share" funding of organic agricultural research, based on the organic share of U.S. retail food sales, calls for at least a 5-fold increase in USDA-ARS resources explicitly allocated to organic ARS should receive a mandatory \$20 M per year for organic research.

b. USDA CSREES: funding for the The Integrated Organic Program (IOP) should be increased to \$10 M mandatory per year. Expansion of this program should focus on a higher number of smaller grants. Also, it is important that this program keeps its own identity and not be incorporated into the National Research Initiative.

c. IPM Centers: The USDA CSREES Integrated Pest Management Centers should have a role in expanding the USDA organic portfolio. The development of "Strategic Plans for Organic Best Management Practices" is a potential way these centers could better serve the organic sector.

d. National Research Initiative (NRI)- Organic plant and animal breeding should become a priority area within existing NRI germplasm programs.

e. Land Grant Universities should be directed to spend an increased percentage of agriculture research dollars on organic through an amendment of the Hatch Act.

f. The 2007 Farm Bill should amend the Smith-Lever Act to direct the Cooperative Extension to spend an increased percentage of agriculture extension dollars on organic should be considered.

g. USDA National Agriculture Library: Fund the USDA National Agriculture Library's Alternative Farming Systems Information Center (AFSIC) to manage the www.OrganicAgInfo.org website as a publicly available online database of research and extension information specific to organic production and marketing.

4) Expanded data on the organic sector is essential to better understanding the organic industry's growth and trends. The Organic Production and Marketing Data Initiative provided for in the Farm Security and Rural Investment Act of 2002 Farm Bill should be fully implemented.

Question4: 1) The Conservation Security Program, which rewards farmers for effective conservation and advanced stewardship should be fully funded as an uncapped entitlement program as stipulated in the 2002 Farm Bill. The CSP should serve as a foundation on which to build future farm policy and a turning point that marks a shift from policies that focus on land retirement to those that place an equal emphasis on environmental stewardship on working lands and a shift from trade-distorting production subsidies to farm support based on environmental performance. CSP should be restructured to work better for organic producers and language should be added to the authorization to ensure that the program effectively serves the organic community. For example, basic organic practices such as cover cropping and crop rotations should be prioritized. Also, organic farm plans should be accepted as proof of compliance with the highest tier (III) of conservation.

2) Transition payments for transition to organic production should be added to Environmental Quality Incentives program (EQIP) nation priorities

3) Technical Assistance Providers- Funding and programmatic

direction is needed for technical assistance providers specific to organic.

4) NRCS needs a point person for organic agriculture who will coordinate how organic production is treated by the USDA conservation programs and does outreach to the organic community.

Question5: 1) Supporting payment limitations could free up a considerable amount of money to increase USDA investment in rural development and conservation programs.

2) The 2007 Farm Bill should support policies that invest in entrepreneurial activities on farms. The USDA Value-Added Producer Grants program, which has been cut by 60% from its original funding level, should be restored.

Question6: 1) The Organic certification cost share program (Sec. 10606 from 2002 farm bill) should receive a mandatory \$2 M per year. Standardized reporting should be required for both allocations to states and actual disbursement to producers and handlers.

2) Organic research funding should be dramatically increased to reflect at least its commensurate share of research dollars.

3) The National Research Initiative/Initiative for Future Agriculture and Food Systems (IFAFS) needs to be funded at its authorized level with goals that more firmly address the unique needs of small and medium-sized organic farmers. Specifically, funds need to be directed towards plant and animal breeding of varieties suited to organic systems, ecosystem management, and economic viability of small and mid sized organic farms.

4) An organic program should be developed within the USDA ARS with the oversight of a National Program Leader (NPL) for Organic Agriculture. ARS should receive a mandatory \$20 M per year for organic research.

5) USDA CSREES: The Integrated Organic Program funding should be increased to \$10 M mandatory per year. Expansion of this program should focus on a higher number of smaller grants. There should be a competitive grant program designed to fund marketing, economic and policy-related research pertinent to the organic industry. Such a grants program would be part of the USDA CSREES Integrated Organic Program and fall under the oversight of the National Program Leader for Organic Agriculture.

The extension component of the Integrated Organic Program should be refined and strengthened.

6) IPM Centers: The USDA CSREES Integrated Pest Management Centers should have a role in expanding the USDA organic portfolio. The development of ?Strategic Plans for Organic Best Management Practices? is a potential way these centers could better serve the organic sector.

a. National Research Initiative (NRI) - Organic plant and animal breeding should become a priority area within existing NRI germplasm programs

7) Extension

a. The 2007 Farm Bill should amend the Smith-Lever Act to direct the Cooperative Extension to spend an increased percentage of agriculture extension dollars on organic.

b. USDA National Agriculture Library: Fund the USDA National Agriculture Library?s Alternative Farming Systems Information Center (AFSIC) to manage the www.OrganicAgInfo.org website as a publicly available online database of research and extension information specific to organic production and marketing.

8) Require labeling and strict liability for GMO contamination from GMO patent-holders and/or manufacturers